

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

CENTURY 21 DEPARTMENT STORES, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 20-bk-12097 (SCC)

Jointly Administered

CENTURY 21 DEPARTMENT STORES, LLC,
66 PEARL RETAIL, LLC, 66 PEARL RETAIL II, LLC, 66
PEARL RETAIL ISG, LLC, 173 BWAY BLUE LLC, 262 MOTT
BLUE TIC LLC, 444 86 BLUE LLC, MIAMI DD 101 BLUE
LLC, 28 NEWBURY JSRE TIC LLC, TRUE BLUE
ASSOCIATES LLC, STAR OF DAVID,
IRAYMOND-77 WARREN LLC, SABRA ASSOCIATES LLC,
315 SEVENTH RETAIL LLC,
WEBWAY ASSOCIATES LLC, and CENTURY 21, INC.,

Adv. Proc. No. 20-1222 (SCC)

Plaintiffs,

v.

STARR SURPLUS LINES INSURANCE CO.,
ALLIANZ GLOBAL RISKS US INSURANCE CO.,
AXIS SURPLUS LINES INSURANCE CO.,
LIBERTY MUTUAL FIRE INSURANCE CO.,
STEADFAST INSURANCE CO.,
ENDURANCE AMERICAN SPECIALTY INSURANCE CO.,
EVANSTON INSURANCE CO.,
LANDMARK AMERICAN INSURANCE CO.,
QBE SPECIALTY INSURANCE CO.,
GREAT AMERICAN FIDELITY INSURANCE CO.,
and CERTAIN UNDERWRITERS AT LLOYDS
SUBSCRIBING TO POLICY Nos. PG1902704,
PG1902346, PG1902696, PG1902698, PG1902707,
PG1902702, and PG1902712,

Defendants.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are Century 21 Department Stores LLC (4073), L.I. 2000, Inc. (9619), C21 Department Stores Holdings LLC (8952), Giftco 21 LLC (0347), Century 21 Fulton LLC (4536), C21 Philadelphia LLC (2106), Century 21 Department Stores of New Jersey, L.L.C. (1705), Century 21 Gardens of Jersey, LLC (9882), C21 Sawgrass Blue, LLC (8286), C21 GA Blue LLC (5776), and Century Paramus Realty LLC (5033). The Debtors' principal place of business is: 22 Cortlandt Street, 5th Floor, New York, NY 10007.

**STATEMENT OF DEFENDANT ENDURANCE AMERICAN SPECIALTY INSURANCE
CO. PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9027(e)(3)**

1. Defendant Endurance American Specialty Insurance Company ("Endurance"), by and through its undersigned counsel, states that it does not consent to the entry of final orders or judgments by the Bankruptcy Court.
2. Defendant Endurance does not waive and expressly reserves all of its respective rights, claims, defenses and remedies, including without limitation: (a) the right to request that the Court abstain from hearing this proceeding or remand this proceeding; (b) the right to demand a jury trial; and (c) the right to request that the reference of this proceeding to this Court be withdrawn.

Dated: New York, New York
September 25, 2020

CLYDE & CO US LLP

By: /s/Corey R. Greenwald
Corey R. Greenwald
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*Attorneys for Defendant Endurance
American Specialty Insurance Co.*

CERTIFICATE OF SERVICE

I, Corey R. Greenwald, hereby certify that on the 25th day of September, 2020, I caused to be served the Statement of Defendant Endurance American Specialty Insurance Co. Pursuant to Federal Rule of Bankruptcy Procedure 9027(e)(3) by: (1) the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of New York; and (2) US mail, to the parties on the attached service list.

Dated: New York, New York
September 25, 2020

CLYDE & CO US LLP

By: /s/Corey R. Greenwald
Corey R. Greenwald
William M. Cooney

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